

EXHIBIT 2.4

DEFENDANTS' OBJECTIONS TO PLAINTIFF'S WITNESS LIST

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

**THE TRUSTEES OF PURDUE
UNIVERSITY,**

Plaintiff,

vs.

**STMICROELECTRONICS
INTERNATIONAL N.V. and
STMICROELECTRONICS, INC.,**

Defendants.

Civil Action No. 6:21-CV-00727-ADA-DTG

JURY TRIAL DEMAND

DEFENDANTS' OBJECTIONS TO PLAINTIFF'S WITNESS LIST

Pursuant to the Order Granting Second Amended Scheduling Order (Dkt. 241), the agreements of the parties, and consistent with the Local Rules and this Court's Standing Order on Pre-Trial Procedures and Requirements in Civil Cases, Defendants STMicroelectronics International N.V. and STMicroelectronics, Inc. (collectively, "ST") hereby submit their objections to Plaintiff The Trustees of Purdue University ("Plaintiff")'s proposed trial witness list.

First, ST objects to Dr. Saha being presented via deposition. Dr. Saha is a named inventor, under the possession, custody or control of Plaintiff (Hrg Tr. at PXB at 26:12-15, 27:19-28:1 (Jan. 28, 2022); Dkt. 248 at 1 n.1), and, according to Plaintiff, entitled to 1/6th of the proceeds of this case. If she is presented at trial, it must be via live testimony.

Second, ST objects to Mario Saggio being presented via deposition. He will appear live at trial and Plaintiff may cross-examine him live. The same is true of any other deposed ST witness that appears live at trial.

Third, ST objects to Mr. Robinson or Dr. Potera being presented at trial in any fashion. Their proposed testimony is irrelevant and/or unduly prejudicial.

Fourth, ST objects to Mr. Bisazza being presented at trial in any fashion. The deposition testimony designated by Plaintiff is irrelevant and/or unduly prejudicial.

Fifth, ST objects to Mr. Sandel and/or Mr. Schultz being presented via deposition. Both are current employees of Plaintiff and/or Purdue University. If either is presented at trial, it must be via live testimony.

Sixth, ST objects to Dr. Lundstrom being presented at trial in any fashion. He was not disclosed by Plaintiff during fact discovery. His name was first added to Plaintiff's initial disclosures on July 25, 2023, almost at the end of expert discovery and well after the close of fact discovery on May 22, 2023.

Seventh, ST objects to Mr. Jackson and Ms. Rea being presented at trial in any fashion for the reasons set forth in ST's motions to strike and preclude in full testimony from each of them.

Eighth, ST objects to any ST witnesses' testimony being presented as the corporate testimony or position of ST to the extent it is outside the scope of any topic upon which the witness might have been designated.

Ninth, Plaintiff has not yet disclosed its intended corporate representative at trial. In an abundance of caution, ST reserves the right to argue that the Court should exclude any testimony by witnesses affiliated with Purdue Research Foundation ("PRF") on behalf of Plaintiff. PRF is not a party to this case. No one affiliated with PRF, including the PRF employee listed as a "will-call" witness for Plaintiff, Kenneth Waite, has any access to ST confidential-outside attorneys' eyes only information under the Protective Order. Neither Mr. Waite, nor any other

employee for non-party PRF, should testify on behalf of Plaintiff (including as a corporate representative) simply by virtue of their status as the purported former owner of the '633 patent or otherwise.

Dated: September 5, 2023

Respectfully submitted,

By: /s/ Michael D. Hatcher

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**ATTORNEYS FOR DEFENDANTS
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STMICROELECTRONICS, INC.**

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that a true and correct copy of the foregoing document was served on all parties to this action via email on September 5, 2023.

/s/ Michael D. Hatcher

Michael D. Hatcher